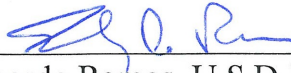


The application is X granted
_____ denied

WHITE & CASE

MEMO ENDORSED



Edgardo Ramos, U.S.D.J.

Dated: April 14, 2022

New York, New York

April 13, 2022

VIA ECF

The Honorable Edgardo Ramos
Thurgood Marshall United States District Courthouse
Southern District of New York
40 Foley Square
New York, New York 10007

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Re: Deutsche Bank Securities Inc. v. Kingate Global Fund Ltd. et al., No. 1:19-cv-10823

Dear Judge Ramos:

Pursuant to Rule 5.2 of the Federal Rules of Civil Procedure, Paragraph 3.ii of Your Honor's Individual Practices, and Paragraph 12 of the Stipulation and Confidentiality Agreement and Protective Order (ECF No. 48) (the "Protective Order"), Plaintiff Deutsche Bank Securities Inc. ("DBSI") respectfully submits this letter-motion seeking an Order sealing (1) DBSI's letter ("Letter") responding to Defendants Kingate Global Fund Ltd.'s and Kingate Euro Fund Ltd.'s ("Kingate") pre-motion letter dated March 21, 2022, and (2) Exhibit A to the Letter.

Paragraph 12 of the Protective Order requires that when filing materials designated as "Confidential" or "Highly Confidential" under the Protective Order, or when filing portions of motions that disclose such designated materials, the parties shall seek approval from the Court via a letter motion "filed electronically through the court's ECF system in conformity with the court's standing order, 19-mc-00583, and ECF Rules & Instructions, section 6."

The Letter and Exhibit A quote from and cite to documents that have been designated as "Confidential" or "Highly Confidential" under the Protective Order by DBSI and a third-party participant and that this Court has already permitted Kingate to file under seal. *See* ECF No. 110. In compliance with Paragraph 12 of the Protective Order, DBSI seeks the Court's permission to file its Letter and Exhibit A under seal, while publicly filing the redacted versions of both documents.

To comply with the Protective Order, DBSI respectfully requests that this letter motion be granted in its entirety and an Order be issued sealing (1) DBSI's Letter, and (2) Exhibit A to the Letter. Respectfully submitted,

/s/ Andrew Hammond
Andrew Hammond

Counsel for Deutsche Bank Securities Inc.

cc: All Counsel of Record (via ECF)